

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 9:24-cv-80281-DMM

ROMEO CHICCO, individually and on behalf
of others similarly situated,

Plaintiff,

v.

GENERAL MOTORS LLC, ONSTAR LLC,
LEXISNEXIS RISK SOLUTIONS INC.

Defendants.

Class Action Complaint

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO
COMPLAINT**

Defendants General Motors LLC (“GM”) and OnStar LLC (“OnStar”), by and through their counsel, pursuant to Fed. R. Civ. P. 6(b)(1), and with the consent of Plaintiff Romeo Chicco and LexisNexis Risk Solutions Inc. (“LexisNexis”), respectfully request that the Court extend the time within which Defendants may respond to Plaintiff’s Complaint (ECF No. 1, the “Complaint”) through and including May 6, 2024. In support of this Consent Motion, Defendants state as follows:

1. Plaintiff filed his Complaint on March 13, 2024. *See* ECF No. 1.
2. GM and OnStar were served with the Complaint on March 15, 2024. *See* ECF No. 7.
3. GM and OnStar’s deadline to respond to the Complaint is April 5, 2024. *See id.*
4. Counsel for GM and OnStar were recently retained in this matter. Plaintiff’s Complaint is a putative nationwide class action asserting two causes of action against Defendants, as well as a cause of action under the Fair Credit Reporting Act against Co-Defendant LexisNexis.

Given the multiple claims and subject matter, as well as the fact that three other similar cases have been filed in other federal courts over the last week, counsel require additional time to investigate the allegations and respond to the Complaint.

5. Counsel for Plaintiff and LexisNexis have stated that they consent to the relief sought in this Motion.

6. The request is being made in good faith and not for the purposes of delay.

7. This is Defendants' first request for an extension, which will promote the interest of justice and judicial economy.

8. Plaintiff also will not suffer any prejudice as a result of a 30-day extension, nor will this extension delay the Court, because this action is in its earliest stage.

9. Good cause for this request has been fully set forth herein, and no brief in support is required pursuant to Southern District Local Rule 7.1(a)(1)(J).

WHEREFORE, GM and OnStar respectfully request that the Court issue an order extending GM and OnStar's deadline to respond to the Complaint by thirty (30) days, *i.e.*, to May 6, 2024. A proposed order is attached herewith.

LOCAL RULE 7.1(a)(3) CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule 7.1(a)(3), counsel certifies that counsel for the movant has conferred with all parties who may be affected by the relief sought in the motion in a good faith effort to resolve the issues raised in the motion and the parties consent to the relief requested in this Motion.

Dated: April 1, 2024

Respectfully submitted,

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